

**Proposed New Policy 3113:**  
**ELECTRONIC FUNDS TRANSFERS**

**Purpose:**

The purpose of this policy is to set forth the procedures for the electronic transfer of public funds of The School Board of Broward County, Florida (hereinafter "Board"). These procedures are designed to ensure the prudent management of public funds and the availability of funds when needed.

**Scope:**

In accordance with Sections 215.85, 218.415, 1010.11 and Chapter 668 Florida Statutes, this policy applies to all cash and deposits held or controlled by the Board with the exception of trust funds, and monies related to the issuance of debt where there are other existing policies or indentures in effect for such monies.

**Electronic Transfer of Funds:**

Board funds may be moved into, out of, and between any Board account by electronic funds transfers (EFTs), which may include direct deposit, wire transfer, Automated Clearing House (ACH), or any other method as may be developed and implemented by financial institutions (depositories/banks) for the purposes of transferring funds between Board accounts or between financial institutions on behalf of the Board. Movement of Board funds by any of the above electronic means shall comply with Section 1010.11 and Chapter 668, Florida Statutes, and State Board of Education (SBE) Rule 6A-1.0012, Florida Administrative Code (FAC).

Board funds shall be electronically transferred including, but not limited to, the following reasons:

- A. Payment of legitimate obligations, based upon legal or contractual requirements, incurred in the course of Board business (e.g., payroll direct deposit, accounts payable, etc.);
- B. Receipt of Board revenue from local, State, and Federal sources (e.g., Florida Education Finance Program (FEFP), Ad Valorem, etc.);
- C. Settlement of investment transactions, (e.g., purchases, sales, or principal and interest distributions);
- D. Transfers between Board accounts as needed for legitimate funds management activities.

**Banking Agreement for EFTs:**

The Board's banking agreement delegates authority to persons holding the positions of Chief Financial Officer (CFO) and Treasurer to execute documents pertaining to the use of banking services, including but not limited to, designating persons authorized to initiate electronic funds transfers (EFTs). The CFO and Treasurer will sign the Treasury Services Delegation Authority Form.

**Electronic Signatures for EFTs:**

Persons that have been authorized to initiate wire transfers shall utilize electronic signatures in the form of passwords and/or Personal Identification Numbers (PIN) or any other secured means established.

**Types of Electronic Funds Transfers:**

The Treasurer, or a designee, will execute electronic transfers of funds through qualified financial institutions as defined below. The Treasurer's Office shall keep and maintain all documentation for auditing purposes.

**A. Wire Transfers**

1. Wire transfers between Board accounts can be initiated and approved by the Treasurer or designee.
2. Repetitive templates of wire transfer instructions to non-Board accounts shall be established by a Treasurer's Office employee using secure banking software provided by the Board's financial institution and approved by the Treasurer or designee. Wire transfers to non-Board accounts can then be initiated by the Treasurer or designee.
3. Non-repetitive wire transfers (e.g., land sales, etc.) may occur between Board accounts or funds may be transferred to a non-Board account. Transfers may be initiated by a Treasurer's Office employee but must be approved by the Treasurer or designee, in writing, prior to the initiation of the transfer. Individuals performing these duties cannot be an initiator and approver of the same transactions.

B. International Wire Transfers

1. International payments are allowed only for foreign trips or programs as specifically approved by the Board.
2. The international payment will be initiated by a Treasurer's Office staff member (**not** the Treasurer) and approved by the Treasurer or designee.
3. Such payments must be made from the Board's Primary Depository Account **ONLY**.

C. ACH Transactions

1. ACH Debit transactions are prohibited, unless the counterparty to the transaction is another governmental entity or the transaction is required by a Board approved contract. An ACH Debit transaction is where funds are to be retrieved from a Board bank account by the counterparty's financial institution.
2. Authorized Board vendors will be paid via ACH Credit transactions when required, based on contractual obligations or when this method of payment is advantageous to the Board. An ACH Credit transaction is where funds are sent from a Board account directly to the vendors' bank account.
3. Authorized vendors to be paid via ACH will be set up to receive such payments in the Board's financial system by Purchasing Department personnel. Such payments will be initiated through the Accounts Payable Department in compliance with established accounts payable procedures.
4. Payment of employees' wages via direct deposit or paycard will be initiated by the Payroll Department in compliance with established payroll procedures.

D. Other Electronic Funds Transfer Transaction Types

Other outgoing electronic funds transfers as established by the Board's financial institution may be permitted, as long as transfers follow similar procedures as outlined above.

Authority: F.S. 215.85, F.S. 218.415, F.S. 1010.11, F.S. Chapter 668, SBE Rule 6A-1.0012, FAC Policy Adopted: